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10 Attorneys for Plaintiffs
IRWIN UNION BANK AND TRUST COMPANY
11 and IRWIN HOME EQUITY CORPORATION

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 IRWIN UNION BANK AND TRUST)
COMPANY AND IRWIN HOME EQUITY)
15 CORPORATION,)

16 Plaintiffs,)

17 v.)

18 FREEDON MORTGAGE COMPANY,)

19 Defendant.)
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CASE NO.: C08-00472-PJH

IRWIN HOME EQUITY
CORPORATION'S MOTION FOR AN
ORDER AND [PROPOSED] ORDER
PERMITTING WITHDRAWAL AND
SUBSTITUTION OF COUNSEL

(Civ. L. R. 7-11 and 11-5)

1 Pursuant to Civil Local Rules 7-11 and 11-5, Plaintiff Irwin Home Equity Corporation
2 (“Irwin Home”) hereby moves the Court for an order permitting the withdrawal of its counsel of
3 record, Stephen Kaus of Cooper, White & Cooper, LLP (“Cooper”) and Michael H. Gottschlich
4 of Barnes & Thornburg, LLP (“Barnes”) and the appearance of substitute counsel, David J.
5 Berger, Jenny L. Dixon and Dominique-Chantale Alepin of Wilson Sonsini Goodrich & Rosati,
6 P.C. (“WSGR”), on its behalf in this action. Irwin Home respectfully submits that said
7 substitution of counsel is in the interests of justice.

8 Irwin Home, Cooper, Barnes and WSGR consent to such withdrawal and substitution of
9 counsel.

10 Accordingly, Irwin Home respectfully requests that the Court enter an Order reflecting
11 this change, and that all necessary changes be made to the Court’s records and ECF, and that all
12 future communications regarding this case be directed to the following:

13 DAVID J. BERGER (Bar No. 147645)
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23 Counsel for Defendant, John K. Crossman of Zukerman Gore & Brandeis, LLP, was
24 informed of the proposed substitution on April 1, 2008.

25 This motion is not made for purposes of delay or any other improper purpose.

26 WHEREFORE, Irwin Home respectfully requests this Court enter its Order permitting
27 withdrawal and substitution of counsel for Irwin Home, and update the Court’s records and ECF
28 system for this case by removing as counsel of record Stephen Kaus of Cooper and Michael H.

1 Gottschlich of Barnes and substituting in their place David J. Berger, Jenny L. Dixon and
2 Dominique-Chantale Alepin of WSGR as counsel of record for Irwin Home.

3 Dated: April 8, 2008

4 WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
David J. Berger (Bar No. 147645)
5 Jenny L. Dixon (Bar No. 192638)
6 Dominique-Chantale Alepin (Bar No. 214648)

7 By: /s/
8 David J. Berger
dberger@wsgr.com

9 650 Page Mill Road
10 Palo Alto, CA 94304
Telephone: (650) 493-9300
11 Facsimile: (650) 493-6811

12 *Attorneys for Plaintiffs Irwin Union Bank and Trust*
13 *Company and Irwin Home Equity Corporation*

14 DATED: April 8, 2008

IRWIN HOME EQUITY CORPORATION

15
16 By: Steven R. Schultz
17 Steven R. Schultz
18 Its Secretary

1 I, Jenny L. Dixon, am the ECF User whose identification and password are being used to
2 file this IRWIN HOME EQUITY CORPORATION'S MOTION FOR AN ORDER AND
3 [PROPOSED] ORDER PERMITTING WITHDRAWAL AND SUBSTITUTION OF COUNSEL.
4 In compliance with General Order 45.X.B, I hereby attest that David J. Berger and Steven R.
5 Schultz have concurred in this filing.

6 Dated April 8, 2008

7 WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

8 By: Jenny L. Dixon
9 Jenny L. Dixon

10 *Attorneys for Plaintiffs Irwin Union Bank and*
11 *Trust Company and Irwin Home Equity*
12 *Corporation*
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[PROPOSED] ORDER

Having reviewed and considered Plaintiff Irwin Home's Motion for An Order Permitting Withdrawal and Substitution of Counsel, and good cause appearing, the Court hereby orders that Stephen Kaus of Cooper, White & Cooper, LLP ("Cooper") and Michael H. Gottschlich of Barnes & Thornburg, LLP ("Barnes") be permitted to withdraw as counsel of record for Irwin Home and David J. Berger, Jenny L. Dixon and Dominique-Chantale Alepin of Wilson Sonsini Goodrich & Rosati, P.C. ("WSGR") may appear as substitute counsel of record for Irwin Home. The Court's ECF system shall be updated to reflect these changes.

DATED: _____, 2008

Honorable Phyllis J. Hamilton
United States District Judge
Northern District of California